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August 18, 2014

The Honorable Jesse M. Furman
United States District Court for the
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *In re: General Motors LLC Ignition Switch Litigation,*
14-MD-2543 (JMF)

Dear Judge Furman:

Pursuant to this Court's Order No. 8 § VII (14-MD-2543, ECF No. 249), we write on behalf of General Motors LLC ("New GM") to inform the Court of New GM's position on the *Edwards* Plaintiffs' motion for leave to file an omnibus complaint (14-MD-2543, ECF No. 188).

Although the *Edwards* Plaintiffs filed their motion for leave in this Court, the appropriate forum for any such filing was the Bankruptcy Court because, on their face, Plaintiffs' claims are subject to the Bankruptcy Court's exclusive jurisdiction under the Sale Order and Injunction. New GM has notified the Bankruptcy Court of the *Edwards* Plaintiffs' filing and addressed that filing in New GM's Pre-Closing Accident Motion to Enforce. (*See* 8/5/14 Letter re Developments in Proceedings Related to MDL 2543, 14-MD-2543, ECF No. 200 at Ex. 4.) Moreover, the *Edwards* Plaintiffs themselves acknowledge the Bankruptcy Court's jurisdiction and procedures relating to New GM's Motions to Enforce. According to Plaintiffs, their claims are "subject to any orders of the bankruptcy court on the threshold issues the same as any other litigant or claimant," they expect to "enter[] into a Stay Stipulation as to the claims set out in the Complaint during the pendency of the orderly and coordinated process ongoing in the Bankruptcy Court which Plaintiffs believe will assure the fair adjudication of important issues," and they are seeking "no other relief" than the filing of their Omnibus Complaint in the MDL. (14-MD-2543, ECF No. 188 at 2-3.)

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Given this, and in order to avoid litigating a potentially unnecessary dispute in this Court, New GM does not object to the filing of the Omnibus Complaint provided that the *Edwards* Plaintiffs do as they have represented and enter into a stay stipulation regarding their case.

Respectfully submitted,

Richard C. Godfrey, P.C.
Andrew B. Bloomer, P.C.

Counsel for Defendant General Motors LLC

cc: Steve W. Berman (Lead Counsel for Plaintiffs)
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